

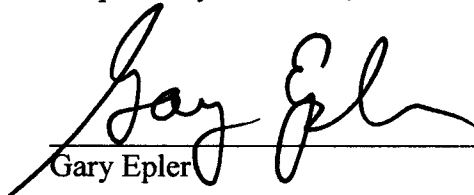
Investigation Pursuant to G.L. c. 164 §§ 1A(a), 1B(d), 94 and 220 C.M.R. § 11.04 into Costs that Should be Included in Default Service Rates of Fitchburg Gas and Electric Light Company

has been found to exist, the [D]epartment shall protect only so much of the information as is necessary to meet such need.

3. Unitil submits that the provisions of this filing described above should be protected from public disclosure because this information is competitively sensitive information concerning Unitil's REC purchases and purchase strategies. This information is normally not disclosed by Unitil, and Unitil takes steps to protect this information from public disclosure. This information reveals data and detail concerning Unitil's REC costs and may enable sellers of RECs to use this normally undisclosed information to Unitil's disadvantage. Unitil submits that this information is well within the scope of "confidential, competitively sensitive or other proprietary information" contemplated by G.L. c. 25, § 5D, and accordingly, should be protected from public disclosure.

WHEREFORE, for all the reasons set forth in this Motion, Unitil respectfully requests that the Department issue an Order granting protective treatment to the provisions of the filing described above.

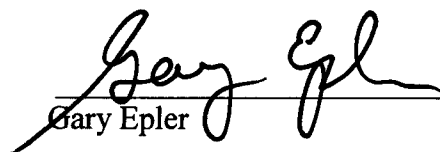
Respectfully submitted,



Gary Epler

Certificate

I certify that copies of this Motion for Protective Treatment has been served this 22nd day of March, via overnight express mail, upon the Massachusetts Office of the Attorney General, and by regular U.S. Mail upon the attached service list.



Gary Epler

DTE 03-88 D Service List

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